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DEC 11 2017

U.S. BANKRUPTCY COURT UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA
MARY A. SCHOTT, CLERK MARC JOHN RANDAZZA,

BK-S-15-14956-abl

Debtor.

Adv. No. 16-01111

V. CRYSTAL L. COX

MOTION TO RECONSIDER Default Judgment

I, Crystal Cox, ask this court to reconsider the Default Entry Order at Doc. Entry 20 and 44,45 Granting a Default Judgment and Granting 5 years of legal fees for Randazza Legal Group and connected attorneys stemming from legal services provided for Marc Randazza, Natalia Randazza, and Jennifer Randazza in District of Nevada Case Randazza et al v. Cox 2:12-cv-02040 against Cox and Eliot Bernstein. Which is the Legal Fees entered at doc. 29,30.

Cox claims that the attorney fees awarded at Order Doc. 44, 45 are not related to this adversary proceeding. Cox was not in default in any action regarding the legal fees Randazza requested at Doc. 29 and 30 that are ONLY attorney fees in another case. Randazza did not discuss those attorney fees in this case until the Oct. 2017 filing, therefore Cox was not in default, as Cox filed Objection to the Default motion, Declaration and Exhibits (Doc. 36). Cox participated in the case and should not have Default and to pay attorney fees in other cases and involving other parties.

Cox hereby enters **Objection to the Default motion, Declaration and Exhibits (Doc. 36)** in their entirety into this Motion for Reconsideration. Please read these entries for Cox's reasons for filing the proof of claim and all related matters.

I, Crystal Cox did not initially answer Adv16-01111, leading to doc. Entry 20, because I had no way to do so at that time, as I was living in my truck and did not have money to print and mail documents and had lost my PO box due to having no money. I had no way to answer at that time. I ask this court to allow my Objection to the Default motion, Declaration and Exhibits (Doc. 36) to be my complaint answer to Randazza's claims in this case and remove default judgment and awarding an indigent a 400K plus judgement. Cox has provided this court with her Defense as to the Adv. Complaint 16-01111.

Cox claims it is a violation of her civil and constitutional rights to simply award Randazza half a million in attorney fees for various other cases, as punishment to a person who could not afford to defend herself.

Cox was not acting malicious, as Cox had no way to respond to this Adv. complaint. The previous year when Cox filed the proof of claim as the court ordered her to do so (see 6 of BK-S-15-14956) Cox had access to a printer and still had her PO box. When this Adv. claim was filed Cox had no way to answer and asks this court to take that into consideration and reverse the default ruling. Cox asks this court to reverse the order stating that she was malicious and Randazza is due punitive damages. Cox was ordered by the court at doc. Entry 6 to file a proof of claim, Cox did so and then the court punishes Cox with a half a million dollar judgment for attorney fees and punitive. Cox's actions were court ordered (see Docket Entry 6 BK-S-15-14956) and not of any malicious intent. Cox moves this court to remove punitive damages granted at Doc. 44,45. And to reconsider Cox a default judgement making Cox pay attorney fees.

Cox did not attend hearings as she has no way to attend. Cox has no phone or way to participate as stated in Cox's pleadings in this matter. Cox moves this court to reconsider her Pleadings Objection to the

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Default motion, Declaration and Exhibits (Doc. 36) as this is her defense, her side of the story in place of attending a hearing of which Pro Se Cox had and has no way to attend. In Cox's Objection (Doc. 36) she explained to this court that she was court ordered to file a Proof of Claim and did so, not maliciously, but instead out of compliances with what the court mailed her and told her to do. see Docket Entry 6 BK-S-15-14956.

(see page 2 and 3 of Cox's Objection to Default Doc. 36)

I ask this court to reconsider Order granting Randazza these legal fees as seen at docket entry 44 and 45 as they are legal fees (doc. 29 and 30) for Cox's former attorney Marc Randazza and for Natalia Randazza, and Jennifer Randazza to their law firm Randazza Legal Group in District of Nevada Case Randazza et al v. Cox 2:12-cv-02040 COMPLAINT against Cox and Eliot Bernstein.

In Granting a Default (see Adv. 16-01111 Docket Entry 44 and 45) this court is ruling that Marc Randazza, Natalia Randazza, and Jennifer Randazza, the Plaintiffs in District of Nevada case are rewarded with Cox paying nearly 500k in their legal fees to sue her and Eliot Bernstein, of which are no part of Adv. 16-01111.

In the very least, Cox asks this court if it cannot reverse the order in it's entirety, that this court can change the Order to only dismiss the Objection to Discharge and the Proof of Claim. As stated above, Cox believed and still believes that the court ordered her to file those documents as seen at doc. 6 of BK-S-15-14956, Marc Randazza's Bankruptcy connected to this case.

Cox moves this court to the least that this court remove the words malicious in describing her actions. The court sent Cox an order telling her to file a Proof of Claim and an Objection to Discharge, and then 2 years later the court rules it malicious that Cox (see 6 of BK-S-15-14956) filed those very same documents, Proof of Claim. Cox asks this court to reconsider and, to in the least, simply order, instead, that the Proof of Claim is dismissed because Cox's counterclaims have not yet been litigated, of which I understand now, and the discharge of debt objection is also dismissed as without a proof of claim it is mute, also of which I now understand.

Dated: December 7th, 2017.


/s/ Crystal L. Cox

Crystal L. Cox, Pro Se

eMail: SavvyBroker@yahoo.com AND ReverendCrystalCox@Gmail.com

Certificate of Service

I certify I sent this Objection to Default Judgement Motion to:

Clerk of Court U.S. Bankruptcy Court
District of Nevada Foley Federal Building
300 Las Vegas Boulevard South Third Floor, Courtroom #1
Las Vegas, NV 89101

